

Scott A. Kronland (SBN 171693)
Stacey M. Leyton (SBN 203827)
Eileen B. Goldsmith (SBN 218029)
Danielle E. Leonard (SBN 218201)
Robin S. Tholin (SBN 344845)
JAMES BALTZER (SBN 332232)
ALTSHULER BERZON LLP
177 Post St., Suite 300
San Francisco, CA 94108

Attorneys for Plaintiff Organizations

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
KELSEY J. HELLAND (CABN 298888)
Assistant United States Attorney
U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495

ERIC HAMILTON
Deputy Assistant Attorney General
DIANE KELLEHER
Branch Director
CHRISTOPHER HALL
Assistant Branch Director
JAMES D. TODD, JR.
Senior Trial Counsel
YURI S. FUCHS
Trial Attorney
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, DC 20044

Counsel for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**STIPULATION AND ~~PROPOSED~~ ORDER
RE: DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

1 Pursuant to Civil Local Rule 7-11, 7-12, and 79-5, the parties hereby stipulate and
2 respectfully request that the Court grant Defendants' Administrative Motion to File Under Seal
3 and permit unredacted copies of the following documents to be filed under seal to protect the
4 personal identifying information of the federal employees identified therein:

- 5 1. Ex. 1: U.S. Department of Defense's List of Employees
- 6 2. Ex. 2: U.S. Department of Veterans Affairs' List of Employees
- 7 3. Ex. 3: U.S. Department of the Interior's List of Employees

8 Redacted copies of these documents will be filed on the public docket.
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 DATED: March 31, 2025

2 Respectfully submitted,

3 Scott A. Kronland (SBN 171693)
4 Stacey M. Leyton (SBN 203827)
5 Eileen B. Goldsmith (SBN 218029)
6 Danielle E. Leonard (SBN 218201)
7 Robin S. Tholin (SBN 344845)
8 JAMES BALTZER (SBN 332232)
9 ALTSHULER BERZON LLP
10 177 Post St., Suite 300
11 San Francisco, CA 94108

12 *Attorneys for Plaintiff Organizations*

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
KELSEY J. HELLAND (CABN 298888)
Assistant United States Attorney
U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495

ERIC HAMILTON
Deputy Assistant Attorney General
DIANE KELLEHER
Branch Director
CHRISTOPHER HALL
Assistant Branch Director

JAMES D. TODD, JR.
Senior Trial Counsel

13 *s/ Yuri S. Fuchs*
14 YURI S. FUCHS
15 Trial Attorney
16 U.S. DEPARTMENT OF JUSTICE
17 Civil Division, Federal Programs Branch
18 P.O. Box 883
19 Washington, DC 20044

20 *Counsel for Defendants*

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: **September 12, 2025**



HON. WILLIAM H. ALSUP
Senior United States District Judge